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Attorneys for Defendants

*Regado Biosciences, Inc., David J. Mazzo,
Christopher E. Courts, R. Don Elsey,
B. Jefferson Clark, Anton Gopka, P. Sherrill Neff,
Dennis Podlesak, Jesse Treu, Raphael Wisniewski*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WILLIAM ALSTON, Individually and on
Behalf of All Others Similarly Situated, ,

Plaintiff,

v.

REGADO BIOSCIENCES, INC., DAVID J.
MAZZO, CHRISTOPHER E. COURTS, R.
DON ELSEY, B. JEFFERSON CLARK,
ANTON GOPKA, P. SHERRILL NEFF,
DENNIS PODLESAK, JESSE TREU,
RAPHAEL WISNIEWSKI, BMO CAPITAL
MARKETS CORP., COWEN AND
COMPANY, LLC, CANACCORD
GENUITY INC., NEEDHAM &
COMPANY, LLC, AND WEDBUSH
SECURITIES INC.,

Defendants.

Case No. 3:14-CV-04380-JAP-DEA

Honorable Joel A. Pisano

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING
DEFENDANTS' RESPONSE TO
COMPLAINT**

Plaintiff William Alston (“Plaintiff”) and defendants Regado Biosciences, Inc., David J. Mazzo, R. Don Elsey, B. Jefferson Clark, Anton Gopka, P. Sherrill Neff, Dennis Podlesak, Jesse Treu, Raphael Wisniewski, BMO Capital Markets Corp., Cowen and Company, LLC, Canaccord Genuity Inc., Needham & Company, LLC, and Wedbush Securities, Inc. (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby agree and stipulate that good cause exists to request an order from the Court extending Defendants’ time to respond to the complaint.

RECITALS

WHEREAS, on July 10, 2014, plaintiff Michael Krzyzak filed a putative class action complaint, captioned *Krzyzak v. Regado Biosciences, Inc., et al.*, Case No. 14-cv-04345-JAP-DEA (the “*Krzyzak* Action”), against some of the Defendants for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

WHEREAS, on July 11, 2014, Plaintiff filed his class action complaint in this Court, captioned *Alston v. Regado Biosciences, Inc.*, Case No. 14-cv-04380-JAP-DEA, asserting the same or substantially similar claims against Defendants as in the *Krzyzak* Action and adding claims under Section 11 and 15 of the Securities Act of 1933;

WHEREAS, under the Private Securities Litigation Reform Act of 1995 (“PSLRA”), when a putative class action alleging securities fraud is filed, a process must be followed whereby the plaintiff gives notice to the putative class, applicants have (60) days to file motion(s) for appointment of lead plaintiff, and the Court then appoints lead plaintiff(s) and approves the selection of lead counsel. 15 U.S.C. § 78u-4(a)(3)(A)-(B);

WHEREAS, on July 11, 2014, Plaintiff provided notice to the putative class, and the sixty day deadline to file motions for consolidation of the related actions, appointment of lead plaintiff and approval of selection of lead counsel and liaison counsel has not yet passed;

WHEREAS, Plaintiff anticipates that the actions will be consolidated and that the lead plaintiff will accordingly need to file a consolidated amended complaint;

WHEREAS, the Parties believe that, in order to avoid the needless waste of the Court's and the parties' resources, it would be prudent to defer Defendants' response to the complaint until after a lead plaintiff has been appointed, the lead plaintiff's selection of lead counsel has been approved, and the lead plaintiff has filed a consolidated amended complaint; and

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties hereto, through their undersigned counsel, as follows:

1. Defendants need not answer, move or otherwise respond to the complaint in this action until a date to be set following the appointment of a lead plaintiff pursuant to 15 U.S.C. §78u-4(a)(3)(B) and the filing by such lead plaintiff of a consolidated amended complaint.

2. Within twenty (20) days following the appointment of lead plaintiff and lead counsel, the Parties will meet and confer and submit a schedule for the filing of a consolidated amended complaint and the time to for Defendants' responses thereto.

3. This Stipulation is entered into without prejudice to any party seeking any interim relief.

4. Nothing in this Stipulation shall be construed as a waiver of any of Defendants' rights or positions in law or equity, or as a waiver of any defenses that Defendants would otherwise have, including, without limitation, jurisdictional defenses.

5. The Parties have not sought any other extensions of time in this action.

WHEREFORE, the Parties respectfully request that this Court issue an order granting the Parties' request as set forth in the following [Proposed] Order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 13, 2014

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Dated: August 13, 2014

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Dated: August 13, 2014

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Company, LLC, Canaccord Genuity Inc., Needham
& Company, LLC and Webush Securities Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 8/25, 2014



THE HONORABLE JOEL A. PISANO
UNITED STATES DISTRICT COURT JUDGE